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20 *Co-Lead Counsel for Plaintiffs*

21  
22 **IN THE UNITED STATES DISTRICT COURT**  
23  
24 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

25 IN RE: UBER TECHNOLOGIES, INC.,  
26 PASSENGER SEXUAL ASSAULT  
27 LITIGATION

28 This Document Relates to:

*Jaylynn Dean v. Uber Technologies, Inc., et al.,*  
3:23-CV-06708

Case No. 3:23-md-03084-CRB (LJC)

STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE TO FILE  
RESPONSE TO DEFENDANTS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIALS SHOULD BE  
SEALED

Judge: Hon. Charles R. Breyer  
Courtroom: Courtroom 6-17<sup>th</sup> Floor

25 WHEREAS, on November 10, 2025, Defendants filed an Administrative Motion to  
26 Consider Whether Another Party's Material Should Be Filed Under Seal [Dkt. 4355], which  
27 included exhibits in Support of Defendants' contemporaneously filed Motion for Partial Summary  
28 Judgment.

WHEREAS, on November 13, 2025, at Plaintiffs' request, Defendants filed an additional Administrative Motion to Consider Whether Another Party's Material Should be Filed Under Seal [Dkt. 4377] to include exhibits that were not originally sealed in the November 10, 2025 [Dkt. 4355] Motion.

WHEREAS, the parties agree that an extension of 7 days to the deadline to for Plaintiffs' to file a statement in response to Defendants' Administrative Motion to Consider Whether Another Party's Materials Should be Sealed [Dkt. 4355] is necessary to review the exhibits for sealable information, consult the bellwether team, and prepare sealing papers.

WHEREAS, the Court has extended other deadlines in the case, but not this one.

WHEREAS, the requested extension will have no bearing of the rest of the case schedule.

THEREFORE, the parties respectfully request the Court enter the parties' stipulation extending Plaintiff's deadline to file a statement in response to Defendants' Administrative Motion to Consider Whether Another Party's Materials Should be Sealed [Dkt. 4355] by 7 days.

**IT IS SO STIPULATED.**

DATED: November 15, 2025

Respectfully submitted,

By: /s/ Rachel Abrams

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Dated: November 15, 2025

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**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: November 15, 2025

/s/ Maya Kalonia

Maya Kalonia

**[PROPOSED] ORDER**

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Charles R. Breyer  
United States District Judge